

**ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE
ENVIRONMENTAL RESTORATION
REGULATORY CONTACT RECORD**

Date/Time: May 15, 2003

Site Contact(s): Susan Serreze, Marla Broussard
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Regulatory Contact: Carl Spreng, Elizabeth Pottorff, Dave Kruchek, Harlen Ainscough
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Agency: CDPHE

Purpose of Contact: Consultative Process Meeting-- Meeting Notes

Discussion

**April 17, 2003 Comment Resolution Meeting
for
IHSS Group 900-4&5 Characterization Data Summary Report
IHSS Group 500-7 Characterization Data Summary Report
IHSS Group 700-3 Characterization Data Summary Report
IASAP Addendum for IHSS Group 500-4
IASAP Addendum for IHSS Group 700-3**

A meeting was held on April 17, 2003, to discuss the IHSS Group 900-4&5 Characterization Data Summary Report, IHSS Group 500-7 Characterization Data Summary Report, IHSS Group 700-3 Characterization Data Summary Report, IASAP Addendum for IHSS Group 500-4, and IASAP Addendum for IHSS Group 700-3

I Attendees

CDPHE Harlen Ainscough, Dave Kruchek, Elizabeth Pottorff, Carl Spreng
DOE Norma Castaneda, Russ McCallister, Reg Tyler
K-H Team Gerry Kelly, Susan Serreze

II Report Status

CDPHE was asked when comments on the Closeout Reports for IHSS Groups 000-1 and 600-1 would be ready. Carl Spreng stated that he would send comments on IHSS Group 000-1 Closeout Report by 4/25/03 and Dave Kruchek stated that he would send

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CEX-105-01



ADMIN RECORD
IA-A-001417

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comments on the IHSS Group 600-1 Closeout Report on 4/22/03 Elizabeth Pottorff stated that she would send comments on IHSS Groups 100-4 and 100-5 Closeout Reports on 4/19/03

III Issues

- 1 The Ash Pits NFAA was reviewed, specifically the Soil Risk Screen CDPHE staff stated that the Soil Risk Screen requires that "potential" impacts must be evaluated and this cannot be conducted using current data Modeling is needed CDPHE staff is concerned that the risk assessment will not cover this issue This is in contrast to the meeting notes from 4/8/03

If there is doubt whether there may be a potential impact to surface water, we need to specify where the impact would be addressed (stewardship, CRA, or IA Plume decision document)

- 2 CDPHE staff stated that they wanted nonradionuclide SORs included in the report This is contrary to the proposed RFCA Modification

IV Meetings

The next meeting is scheduled for Thursday, May 1, 2003, from 11 00 AM to 12 30 PM

V Specific Comments

IHSS Group 900-4&5 Characterization Data Summary Report

CDPHE comments on the Draft IHSS Group 900-4&5 Characterization Data Summary Report were discussed and the following resolutions were agreed to

- 1 Pre-accelerated action data are shown in IASAP Addendum #IA-02-02 A statement whether these data are less than the proposed WRW and ecological ALs will be added to the report The pre-accelerated action data will not be included in the report
- 2 The figures, tables, and appendices will not be revised, however, a statement referencing the reader to the IASAP Addendum #IA-02-02 and indicating whether the pre-accelerated action data are less than proposed WRW and ecological ALs will be added
- 3 The statement referring to the proposed ecological ALs will include "if available" so that this statement is clear that not all analytes currently have proposed ecological ALs
- 4 "At a POC" has been eliminated from the proposed RFCA Modification soil risk screen language and will be removed

- 5 If there is doubt whether there may be a potential impact to surface water, we need to specify where the impact would be addressed (stewardship, CRA, or IA Plume decision document)
- 6 Sampling location numbers will be added to maps where they do not interfere with other map information
- 7 The spelling of dimethyl phthalate will be corrected in the report
- 8 The laboratory reported the MDL in the result field for the nondetects
- 9 The DQA section will be revised Information will be summarized for analytes that are big hitters, but not for analytes that are not a concern
- 10 QA/QC data will be provided

IHSS Group 500-7 Characterization Data Summary Report

CDPHE comments on the Draft IHSS Group 500-7 Draft Characterization Data Summary Report were discussed and the following resolutions were agreed to

- 1 Data summary reports will be called Characterization Data Summary Reports
- 2 The complete data set will be provided to CDPHE
- 3 The Soil Risk Screen is specified for subsurface soil The reason for characterizing surface soil will be stated For example "Historical information indicated that a small surface spill occurred"
- 4 The DQA will include additional summary information and impacts to project decisions

IHSS Group 700-3 Characterization Data Summary Report

CDPHE comments on the Draft IHSS Group 700-3 Characterization Data Summary Report were discussed and the following resolutions were agreed to

- 1 QA/QC data will be provided
- 2 The radionuclide SORs will be calculated and listed in a table
- 3 QA issues as discussed for IHSS Group 900-4&5 will be addressed here also

Draft IASAP Addendum IHSS Group 500-4

CDPHE comments on the Draft IASAP Addendum for IHSS Group 500-4 were discussed and the following resolutions were agreed to

- 1 Sampling methods are defined in the IASAP We do not anticipate having problems such as auger refusal at this IHSS No edits to the text are required
- 2 As stated in the Addendum, the proposed sampling locations are a starting point As always, additional samples will be collected as needed Susan Serreze will research the B553 gravel-lined pit and complete edits if required
- 3 An offsite laboratory will be used for beryllium analyses if beryllium is a COC If beryllium is not a COC, the offsite QA samples will be used
- 4 All laboratory QA/AC controls in the IASAP will be followed No edits to the text are required
- 5 This text will be changed to the following *"This VOC-containing sample point was the only subsurface sample above MDLs, no subsurface sample exceeded a constituent background mean plus two standard deviations "*
- 6 The text will be changed to indicate that two samples will be collected at a depth of 4 feet Additionally, the "C" interval for sampling location CB40-018 was deleted from Table 1
- 7 Table 1 will include the revision CB42-014F to CB42-013F

IHSS Group 700-3 Draft IASAP Addendum

CDPHE comments on the Draft IASAP Addendum for IHSS Group 700-3 were discussed and the following resolutions were agreed to

- 1 Sampling problems at buildings will be discussed with the regulatory agencies to reach agreement on a path forward This has been working at the other UBC characterizations
- 2 The tables and figures will be labeled
- 3 A figure showing sampling locations and results greater than background means plus two standard deviations or method detection limits from the 700-3 Characterization Data Summary Report will be included
- 4 Tanks will be added to the Figures
- 5 The use of the 22-meter grid was approved by CDPHE Additional biased samples will be collected as necessary Additionally, when in the building, the opportunity to

collect additional samples offset from the original under building characterization effort will be considered, based on actual conditions

- 6 This comment will be addressed in the IHSS Group 700-3 Characterization Data Summary Report
- 7 Confidence levels will be addressed in the IASAP Modification
- 8 IHSSs 144(S) and 150 4 will be addressed in the NFAA
- 9 IASAP QA procedures are followed No text edits are required
- 10 Figure 4 will be relabeled to include IHSSs, PACs, and UBC sites
- 11 The IHSSs, PACs, and UBC sites that are not part of IHSS Group 700-3 will be colored differently from the sites of interest
- 12 IHSS 121 is OPWL and is shown as a line, not a shape The Addendum addressed the OPWL within the IHSS Group No edits to the text are required
- 13 Construction fill is not included in the 0 0 - 0 5 foot interval This interval is native soil
- 14 IHSS 121 will be added to Table 3

Distribution

H Ainscough, CDPHE
S Gunderson, CDPHE
D Kruchek, CDPHE
E Pottorff, CDPHE
C Spreng, CDPHE
T Rehder, USEPA
G Kleeman, USEPA
N Castenada, RFFO
R DiSalvo, RFFO
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Administrative Record
ER Meeting Minutes